

September 3, 2024

IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW
JERSEY MARTIN LUTHER KING
BUILDING AND U.S. COURTHOUSE

Mark Appelgren, Pro Se
3718 Columbia Pike, Apt. 2
Arlington, VA 22204

Complainant/Plaintiff

Case No.:

24-CV-8013

v.

City of Fort Lee, New Jersey
Fort Lee Borough Hall
309 Main St.
Fort Lee, New Jersey 07024

and

Fort Lee Police Department, New Jersey,
1327 16th St.
Fort Lee, New Jersey, 07024

and

Fort Lee Police Department, New Jersey,
Fort Lee Officers JOHN DOES 1-10,
1327 16th St.
Fort Lee, New Jersey 07024

Defendants

Date Formal Filed: 09/03/2024

MOTION TO STAY PROCEEDINGS PENDING REVIEW OF AMENDED COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

The Plaintiff, Mark Appelgren, respectfully moves this Court to stay all proceedings in the above-referenced case to allow the Defendants sufficient time to review the Amended Complaint, which was filed with this Court on August 27, 2024, and officially entered by the Court on August 28, 2024. In support of this motion, Plaintiff states as follows:

1. Amended Complaint Filed and Entered: The Plaintiff filed an Amended Complaint with the Court on August 27, 2024. The Amended Complaint was entered into the Court's records on August 28, 2024.

2. Request for Amended Summons: The Plaintiff has requested an amended summons from the Clerk of Courts to accompany the Amended Complaint. The issuance of this summons is pending.

3. Interest in Settlement: The Plaintiff is actively seeking to work towards a fair and honest settlement with the Defendants. To facilitate this process and to ensure that both parties have adequate time to consider the Amended Complaint, it is in the best interest of justice that all deadlines, hearings, and other proceedings be stayed until the Defendants have had an opportunity to review the Amended Complaint once the amended summons is issued.

4. Time for Defendants' Review: Staying the proceedings will provide the Defendants and their counsel with the necessary time to review the Amended Complaint in detail. This will promote a more informed and productive dialogue between the parties, potentially leading to a settlement.

WHEREFORE, the Plaintiff respectfully requests that the Court grant this Motion to Stay Proceedings until such time as the Defendants have had an opportunity to review the Amended Complaint and respond accordingly.

The Plaintiff is eager to work with the Defendants and their counsel towards a resolution and believes that staying the proceedings will benefit both parties in achieving a fair and equitable settlement.

DATED: September 3, 2024

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Appelgren', with a long, sweeping horizontal line extending to the right.

/s/ Mark Appelgren

Mark Appelgren, Pro Se

3718 Columbia Pike, Apt. 2

Arlington, VA 22204

Phone: 201-232-1441

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Certificate of Service

I, Mark Appelgren, hereby certify that a true and correct copy of the foregoing Motion was provided to Defendants' Counsel of Record on this 3rd day of September 2024, via certified mail and Transmission of Notices of Electronic filing granted by CM/ECF. Additionally, a copy of this Motion to the Court was filed via electronic mail ecfhelp@njd.uscourts.gov.

Dated: September 3, 2024

A handwritten signature in black ink, appearing to read 'Mark Appelgren', is written over a horizontal line.

Mark Appelgren

Plaintiff, Pro Se

CC: Counsel of Record